



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

VIA MAIL

February 9, 2021

Hon. Andrew E. Krause, U.S.M.J.
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: **Johnson v. McMorrow, et al., 19-cv-6480 (PMH)(AEK)**

Dear Judge Krause:

This Office represents Defendants in the above-referenced action. As mentioned during the parties' January 28, 2021 status conference, an extension of the discovery deadlines will now be necessary in order to accommodate the remaining named defendant (Trooper Rodriguez)'s deposition, which has been scheduled for March 11, 2021 (subject to adjournment, should the trial that the undersigned currently has scheduled to begin before the Honorable Philip Halpern on March 10th go forward).

Accordingly, Defendants request that the following deadlines for the remainder of discovery be adjourned to the dates indicated below:

Current Deadlines	Proposed Deadlines
• February 19, 2021: Deadline to complete fact discovery	• March 12, 2021
• March 19, 2021: Plaintiff's expert disclosures due	• April 16, 2021
• April 16, 2021: Defendants' expert disclosures due	• May 14, 2021
• May 7, 2021: Deadline to complete expert depositions and all discovery	• June 4, 2021

Additionally, Defendants request that the status conference currently scheduled for February 23, 2021 be re-scheduled to the week of March 15, 2021. Counsel have conferred and, subject to the undersigned's trial noted above, are generally available that week.

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Plaintiff's counsel consents to the above-requested extensions and adjournment.

Respectfully submitted,

/s/ Deanna L. Collins

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Cc: Counsel of Record (by ECF)

The proposed revised discovery schedule is APPROVED, and the deadlines are revised as set forth herein. In addition, the February 23, 2021 conference is ADJOURNED to March 17, 2021 at 4:00 p.m.; the parties are directed to use the same teleconference information that they have used for previous conferences with Magistrate Judge Krause.

Dated: February 9, 2021

SO ORDERED.



ANDREW E. KRAUSE
United States Magistrate Judge